

1 R. Alexander Pilmer (State Bar No. 166196)  
2 Email: alexander.pilmer@kirkland.com  
3 David I. Horowitz (State Bar No. 248414)  
4 Email: david.horowitz@kirkland.com  
5 Jay L. Bhimani (State Bar No. 267689)  
6 Email: jay.bhimani@kirkland.com  
7 Kristin E. Rose (State Bar No. 278284)  
8 Email: kristin.rose@kirkland.com  
9 KIRKLAND & ELLIS LLP  
333 South Hope Street  
Los Angeles, California 90071  
Telephone: (213) 680-8400  
Facsimile: (213) 680-8500

8 Attorneys for Defendants  
RBS Securities Inc. and RBS Acceptance Inc.

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **WESTERN DIVISION**

13 NATIONAL CREDIT UNION  
14 ADMINISTRATION BOARD, as  
15 Liquidating Agent of Western Corporate  
Federal Credit Union,

16 Plaintiff,

17 vs.

18 RBS SECURITIES INC. *et al.*,

19 Defendants.

Case No. CV 11-05887 GW (JEMx)

**APPLICATION TO FILE  
DOCUMENTS UNDER SEAL**

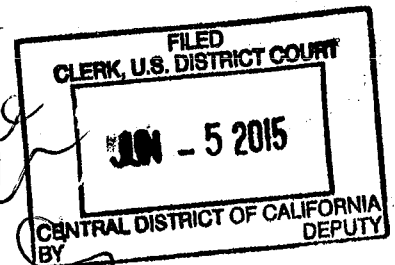
**[L.R. 79-5.1]**

Judge: George H. Wu  
Courtroom: 10

Complaint Filed:  
July 18, 2011

First Amended Complaint Filed:  
August 19, 2013

Second Amended Complaint Filed:  
November 14, 2014



Pursuant to Local Rule 79–5.1, Defendants RBS Securities Inc. and RBS Acceptance Inc. (collectively “RBS”) hereby request permission from the Court to file under seal the following documents:

1. Exhibits F through I to RBS’s Letter Motion to Compel Discovery of *Corporate America* Transcripts (the “Letter Motion”), which was attached as Exhibit 1 to the concurrently filed Notice of Filing of RBS’s Letter Motion to Compel Discovery of *Corporate America* Transcripts.

The Court has entered a Master Protective Order relating to this action. ECF No. 318. The Master Protective Order states that:

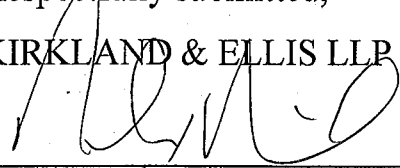
In the event that before trial in the Related Actions, or in connection with any hearing in or any matter relating to the Related Actions, counsel for any Party determines to file or submit in writing to the Clerk's office any Protected Material, or any papers containing or making reference to the substance of such material or information, such documents or portions thereof containing or making reference to such material or information shall be filed with a request that the documents be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

Plaintiff National Credit Union Administration Board designated Exhibits F through I to RBS’s Letter Motion as Confidential under the Master Protective Order. In accordance with Paragraph 9 of the Master Protective Order, RBS requests that these exhibits be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

DATED: June 4, 2015

Respectfully submitted,

KIRKLAND & ELLIS LLP

  
R. Alexander Pilmer

Attorneys for Defendants RBS Securities Inc.  
and RBS Acceptance Inc.